

CARL GORDON
UNIVERSITY OF THE 'HOOD®
8306 Wilshire Blvd., No. 792, Beverly Hills, CA 90211
Tel. (310) 289-8057/(310) 926-3939
Email: universityofthehood@gmail.com
Pro se Plaintiff/Relator: Carl Gordon

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

The United States of America
ex rel. Carl Gordon,

Plaintiff,

v.

Gavin Newsom, governor of California; Eleni Kounalakis, lieutenant governor of California; Rob Bonta, attorney general of California; Shirley N. Weber, secretary of state of California; Steven J. Reyes, chief counsel of the Office of the Secretary of State of California, and the office's outside counsel, Kevin Calia, partner in Boersch & Illovsky LLP; James Patrick Arguelles, Sacramento Superior Court Judge; Defendant sued in their individual capacities; the California Association of Clerks and Election Officials; the California Democratic Party; the Democratic Governors Association; and DOES 1 through 10,

Defendants.

Hon. Josephine L. Staton
Case No.: 2:23-cv-06727-JLS-MAR

PLAINTIFF RELATOR CARL GORDON RESPECTFULLY REQUESTS A 45-DAY EXTENSION OF TIME TO RESPOND TO THE COURT'S AUGUST 14, 2024, OSC DUE TO A POSSIBLE UNIVERSAL COMPREHENSIVE SETTLEMENT IN ALL RELATED CASES BETWEEN PLAINTIFF AND ALL DEFENDANTS.

United States Courthouse
350 West First Street,
Los Angeles, CA 90012
Courtroom 7B

1 Plaintiff Relator Carl Gordon respectfully requests a 60-day extension of
2 time, up to and including Friday, October 11, 2024, to respond to the Court's
3 August 14, 2024, OSC due to a possible universal comprehensive settlement in
4 all related cases between Plaintiff and all Defendants.

5 On August 9, 2024, Plaintiff Relator Carl Gordon reached out to the
6 Attorney General's office seeking their input on reaching a comprehensive
7 settlement for all recall-related cases, including this instant subsequent False
8 Claims Act action. The gist of the outreach was as follows:

9 Dear:

10 Nicholas Green, Mark Beckington Natasha Saggar Sheth, Paul Stein, Thomas
11 Patterson, and Akilah Faizah Weber

12 The dynamics of the 2024 presidential race have changed since I initially
13 broached the subject of a settlement in these cases. Therefore, I'm reaching out to
14 you again for a response by tomorrow, Saturday, August 10, 2024, to explore the
15 possibilities of a settlement. We are under a deadline at this time, partly because
16 Trump has re-committed to a September 10, 2024, debate, and also because we
17 must continue prosecuting these cases, which frankly is a distraction from our
independent efforts to help get Vice President Kamala Harris elected president.
Please see our video presentation in support of that effort in the past:

[<https://kamalaharrisforusvp.com/>]

18 In addition, we are focused on establishing the Jack Roosevelt "Jackie" Robinson
19 Institute of Sports Management and building the Jackie Robinson Stadium
20 complex on Bruin Walk at UCLA, in preparation for the 2028 Olympic Games in
Los Angeles. Please see our video presentation

21 At the University of the 'Hood, we envision a future where we honor Jackie
22 Robinson's legacy—42 Forever—every year on April 15. ***Let us come together to***
23 ***celebrate our oneness as Americans and the beauty of our diversity*** every April
15th. <https://bit.ly/> <https://youtu.be/4Hv88E1OaNU>

24 As you are well aware, President Joe Biden announced on Sunday, July 21, 2024,
25 that he would end his presidential re-election campaign and endorsed Vice
26 President Kamala Harris to be the Democratic nominee. Harris officially secured
the Democratic Party's nomination for President and introduced her running mate,
27 Tim Walz, just three days ago, on August 6, 2024.

28 PLAINTIFF RELATOR CARL GORDON RESPECTFULLY REQUEST FOR EXTENSION OF TIME 2

1 However, what you may not know is that I have been in two-way communication
2 with the Biden White House over the past few months regarding the False Claims
3 Act (FCA) action *The United States of America et al. v. Gavin Newsom et al.*,
4 Case No. 2:23-cv-06727-JLS-MAR, to reach an agreement on the critical
5 question: “What did the President know and when did he know it?” Specifically,
6 this concerns President Biden’s knowledge and involvement in Governor Gavin
7 Newsom’s 2021 gubernatorial recall election, particularly in light of President
8 Biden’s participation in a Get Out the Vote event with Governor Newsom on
9 September 13, 2021, and Vice President Harris’s campaigning for Newsom five
10 days earlier on September 8, 2021, and to find a solution to the ongoing litigation.

11 At this critical time, with the new Harris-Walz presidential campaign underway, I
12 am reaching out to share important information with you and your clients to
13 facilitate a comprehensive settlement agreement regarding all pending lawsuits
14 related to the 2021 gubernatorial recall election.

15 To be abundantly clear, I and all of my supporters have supported and predicted,
16 since day one (November 9, 2016), that Ms. Harris would someday become
17 President of the United States. Please see the attached copy of an email dated
18 November 19, 2016, that I sent to the U.S. Representative Debbie Dingell in
19 response to her November 9, 2016, NPR interview titled “*Rep. Debbie Dingell*
20 *On Clinton Loss: People Took Michigan For Granted*”, and to Marc Elias,
21 Hillary Clinton’s campaign lawyer.

22 Moreover, we went further than mere words; we took action and became
23 proactive in Ms. Harris’s ascension to the vice presidency in 2020. Please see the
24 above cited video presentation in support of that effort.

25 At this critical time of a polarizing political climate over voting and election
26 integrity, there is an enormous reason and incentive to find a solution to the
27 ongoing litigation over the legitimacy of the 2021 gubernatorial recall election.
28 The optics involving Governor Newsom, California Lieutenant Governor Eleni
Kounalakis, President Joe Biden, and now Democratic Party Presidential nominee
Vice President Kamala Harris further underscore the importance of resolving this
issue. We hope you see the wisdom and opportunity in addressing this matter and
agree to move forward toward a resolution. Please share this entire outreach with
all your clients and other affected parties. Especially, the Honorable California
Secretary of State Dr. State Shirley Nash Weber, Ph.D.

29 Sincerely and seriously,
30 Carl Gordon, MPA, the University of Southern California
31 Co-founder and the first steward of the University of the ’Hood®
32 University of the ’Hood, Ph.D., *summa cum laude*

1 On August 12, 2024, at 4:01p.m., on behalf of the AG's office Nicholas
2 Reiss Green CAAG - Office of the Attorney General California Department of
3 Justice responded as follows:

4 Mr. Gordon,

5 Thank you for your email, and for your suggestion that the parties consider a
6 resolution to these cases. However, we need a better understanding of your
7 proposal. Would you please let us know, specifically, what you have in mind for
8 an acceptable resolution?

9 Kind regards,

10 Nick

11 Please See the email exchange attached as **Exhibit A**, and **Exhibit**
12 **B**, respectively.

13 Given these ongoing efforts and the potential positive impact of an
14 extension, Plaintiff Relator Gordon respectfully requests the Court to grant a 60-
15 day extension from August 14, 2024, up to and including Friday, October 11,
16 2024.

17
18 **1. The Court should exercise its discretion to extend the time**

19 **Fed. R. Civ. P. 6(b) provides in relevant part:**

20 “(1) When an act may or must be done within a specified time, the court
21 may, for good cause, extend the time:

22 (A) with or without motion or notice if the court acts, or if a request is
23 made, before the original time or its extension expires; or

24 (B) on motion made after the time has expired if the party failed to act
25 because of excusable neglect.”
26

1 Under Fed. R. Civ. P. 6(b), the Court has the discretion to extend periods
2 of time established by the rules or by a prior court order. See, e.g., *Maldonado-*
3 *Denis v. Castillo-Rodriguez*, 23 F.3d 576, 583 (1st Cir. 1994) (the trial court has
4 complete discretion to grant or deny requests for enlarged time to respond to a
5 motion). The courts are liberal in granting requests for enlargement of time when
6 good cause for such enlargement is apparent. See, e.g., 1 Moore's Federal
7 Practice, §606[1] et seq. (Matthew Bender, 3rd Ed.). "Good cause" is a non-
8 rigorous standard that has been construed broadly across procedural and statutory
9 contexts. *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir.
10 2010). Rule 6(b)(1) "is to be liberally construed to effectuate the general purpose
11 of seeing that cases are tried on the merits. 'Id. "Consequently, requests for
12 extensions of time made before the applicable deadline has passed should
13 normally be granted in the absence of bad faith or prejudice to the adverse party."
14 Id. (quotations omitted).

15
16 Here, good cause exists to extend the time for Plaintiff Relator Gordon,
17 and the Defendants are not prejudiced, on the contrary it gives all parties an
18 opportunity to reach an equitable settlement out of court on all case.

19
20 Date: August 12, 2024.

Respectfully submitted,

21
22 

23 By _____
CARL GORDON,
24 PRO SE PLAINTIFF RELATOR

EXHIBIT A



Carl Gordon <universityofthehood@gmail.com>

Working toward our shared goal of democracy and election integrity in the United States of America, and especially in California, as we strive for the election of fellow Californian!

4 messages

Carl Gordon <universityofthehood@gmail.com>

Fri, Aug 9, 2024 a

To: Nicholas Green <Nicholas.Green@doj.ca.gov>, Mark Beckington <Mark.Beckington@doj.ca.gov>, Natasha Saggar Sheth <Natasha.Sheth@doj.ca.gov>, Paul Stein <Paul.Stein@doj.ca.gov>, thomas.patterson@doj.ca.gov, akilahfaizah2@gmail.com, saweber31@cox.net

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8306 Wilshire Blvd., No. 792

Beverly Hills, CA 90211

Tel. (310) 926-3939

Email: universityofthehood@gmail.com

PLAINTIFF IN PRO SE, CARL GORDON

Re: 2:23-cv-06727-JLS-MAR The United States of America et al v. Gavin Newsom et al
2:24-cv-05384-PSG Carl Gordon v. Fernando Manzano Olguin et al
2:24-cv-06476-MRA-AS Carl Gordon v. Gavin Newsom et al
2:24-cv-03683-MRA-AS Carl Gordon v. Eleni Kounalakis et al
2:21-cv-07270-FMO-MAR Carl Gordon v. Gavin Newsom et al **100 percent corrupted**
Case No.: 22-55640 Carl Gordon v. Gavin Newsom et al **100 percent corrupted**

Dear

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In addition, we are focused on establishing the Jack Roosevelt "Jackie" Robinson Institute of Sports Management and building the Jackie Robinson Stadium complex on Bruin Walk at U preparation for the 2028 Olympic Games in Los Angeles. Please see our video presentation

At the University of the 'Hood, we envision a future where we honor Jackie Robinson's legacy—42 Forever—every year on April 15. *Let us come together to celebrate our oneness as Americans and the beauty of our diversity* every April 15th. <https://bit.ly/> <https://youtu.be/4Hv88E1OaNU>

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Sincerely and seriously,

Carl Gordon, MPA, the University of Southern California

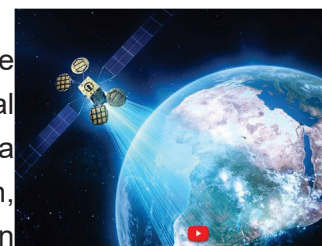
Co-founder and the first steward of the University of the 'Hood®

University of the 'Hood, Ph.D., *summa cum laude*

The four elements of the Jackie Robinson proposal

One, the establishment of a living educational memorial called the Jack Roosevelt "Jackie" Robinson Institute of Sports Management—an accredited academic degree-conferring institute to increase inclusion and diversity (preparing people of color to enter the management and ownership ranks of the \$75 billion-per-year sports industry)—and integrating and coordinating it with HBCU and UCLA's existing UC-HBCU Initiative under the auspices of the UCLA Anderson School of Management.

Four, let us commemorate as an official national holiday—a day of healing, a day of national reflection, and a day of reconciliation each year—the day (April 15, 1947) that Jackie



Human Origins 101 | National Geograph

770

Two, renaming Le Conte Avenue at the gateway to the campus of UCLA as “Jackie Robinson Way” in honor of Jackie Robinson and his widow, 100-year-old (July 19, 2022), [Rachel Robinson](#), a UCLA alumna. Currently, it is named for Joseph Le Conte, the lifelong white supremacist and a Confederate officer from a family of enslavers of Black Americans since before the American Revolution.

Three, the relocation of the current Jackie Robinson Stadium and construction of a new one on the campus of UCLA within three years (notwithstanding the unfair [West Los Angeles Leasing Act of 2016](#), fast-tracked by California Senators Dianne Feinstein and Barbara Boxer and passed with the suspension of “regular order” and without public hearings in the waning months of the Obama administration). Doing so would free up the Veterans Administration (VA) land that is desperately needed for homeless veterans. [Los Angeles is the homeless veterans capital of the nation.](#)

Jackie Robinson Stadium currently occupies a portion of this land. The land was deeded to the United States in 1888 for the specific purpose of providing housing for disabled veterans. Further, adequate compensation (with an annuity to the Jackie Robinson Foundation and the Jackie Robinson Museum) should be procured for the Robinson family for the naming rights of the new stadium and for the prestigious annual Jackie Robinson International Sports Conference at the complex on the campus of UCLA. Imagine a new Jackie Robinson Stadium on Bruin Walk. Enjoy the tour again <https://youtu.be/4Hv88E1OaNU>, and imagine being there.

Robinson, Wesley Branch Rickey, and then-commissioner of Major League Baseball Albert Benjamin integrated Major League Baseball. Let us also make April 16 the day for filing taxes so that each April 15 is reserved exclusively for education about, reflection on, and healing of the long-lasting divisions in our nation over the Creator’s infinite wisdom of the biological process of each human being producing more or less melanin—the pigment determining one’s skin, hair, and eye color.

As a nation, we need to confront and deal with this centuries-old simple yet agonizing conundrum now more than ever. Please note that I did not say that we have a race problem; that’s because we don’t! What we have is a lack of understanding, education, and wisdom to know that we are all the same. There’s only one race—the *human race, male and female!* We’re all *descendants of mitochondrial Eve out of Africa.*

This national day of remembrance is for all Americans and future generations of Americans to acknowledge where we were in 1947, the progress

we have made in human relations as a nation, and where we want to be as Americans—one nation under God, indivisible, with liberty and justice for all while we celebrate our oneness as Americans and the beauty of our diversity.

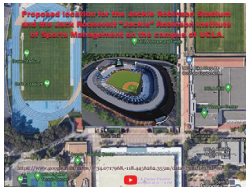
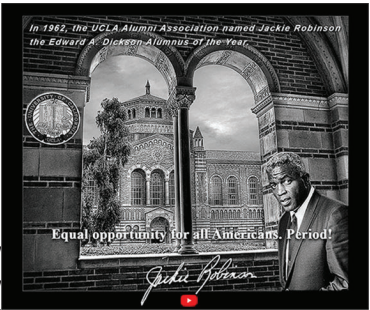


The sports pantheons erected on Bruin Walk on the campus of UCLA in honor of the all-time great UCLA sports figures and other luminaries are reserved for whites only. The great Jackie Robinson, excluded from this illustrious honor by UCLA! Fight to stop UCLA from discriminating against Jackie Robinson any longer.

Why is there no sports and educational temple erected on the campus of UCLA on the renowned Bruin Walk in honor of Jackie Robinson?

It is a shame and a travesty that UCLA and the University of California Board of Regents have failed to recognize one of the most consequential individuals of the 20th century, a world-renowned and famous alumnus.

Jackie Robinson was UCLA's first and only four-sport letter recipient, achieving that extraordinary feat all while simultaneously coping with the egregious white supremacists' impediments



PAULEY PAVILION is an indoor arena on the campus of UCLA, dedicated in honor of UC Regent Edwin W. Pauley. It is home to the UCLA Bruins men's and women's basketball, the men's and women's volleyball, and the women's gymnastics teams. There is an eight-foot memorial statue of John Wooden just outside Pauley



#772

of entrenched institutionalized racism, segregation, and discrimination (Jim Crow laws) not only at UCLA but also throughout California and the nation, as mandated by the U.S. Supreme Court while he and Rachel Annetta Isum attended UCLA.

Neither he nor his future wife, UCLA alumna Rachel, could live in the dorms on the campus of UCLA, simply because of their God-given ability to produce an abundance of melanin. By God's grace, Mrs. Robinson will be 99 years old on her next birthday, July 19, 2021.

Compare with Jackie Robinson those individuals pictured to the immediate right who are honored on the Bruin Walk. Then ask yourself—are institutional segregation, discrimination, and racism still being practiced at UCLA?

The resounding answer is yes! Read the Independent Investigative Report on Acts of Bias and Discrimination Involving Faculty at the University of California, Los Angeles, October 15, 2013. <https://www.ucop.edu/moreno-report/external-review-team-report-10-15-13.pdf>

Pavilion, diagonally across from the John Wooden Center. Jackie Robinson got a 42-inch-high monument and two benches!

THE JOHN WOODEN

CENTER is named in honor of legendary basketball coach John Wooden. It is the main building for intramural athletics at UCLA. It serves as one of the home venues for the UCLA women's volleyball team and is a training gym for the UCLA gymnastics team.


DRAKE

STADIUM is the home of UCLA's track and field team. The stadium was named in honor of Elvin C. "Ducky" Drake, a student-athlete, track coach, and athletic trainer for over 60 years at UCLA.

STRAUS

STADIUM at the L.A. Tennis Center, on the UCLA campus, is a tennis facility for the UCLA Bruins women's and men's tennis teams. Straus Stadium was named for Leonard Straus, the former chairman of Thrifty

Drugs; the center court is called the Times-Mirror Center Court, and the tennis drawboard was named for Johnny Carson. The scoreboard is the Union 76 Scoreboard.

 11 19 16 Rep. Debbie Dingell On Clinton Loss_ 'People Took Michigan For Granted'.pdf
168K

Fri, Aug 9, 2024 at 11:48 AM

Carl Gordon <universityofthehood@gmail.com>
To: anya.binsacca@doj.ca.gov

Supervising Deputy AG Anya Binsacca
[Quoted text hidden]

11 19 16 Rep. Debbie Dingell On Clinton Loss_ 'People Took Michigan For Granted'.pdf
168K



Nicholas Green <Nicholas.Green@doj.ca.gov>
To: Carl Gordon <universityofthehood@gmail.com>
Cc: Mark Beckington <Mark.Beckington@doj.ca.gov>

Mon, Aug 12, 2024 at 4:01 PM

Mr. Gordon,

Thank you for your email, and for your suggestion that the parties consider a resolution to these cases. However, we need a better understanding of your proposal. Would you please let us know, specifically, what you have in mind for an acceptable resolution?

Kind regards,

Nick

Nicholas R. Green

Deputy Attorney General

California Attorney General's Office | Government Law Section

455 Golden Gate Avenue, Suite 11000 | San Francisco, CA 94102 |

Tel: (415) 510-3597 | Nicholas.Green@doj.ca.gov

From: Carl Gordon <universityofthehood@gmail.com>

Sent: Friday, August 9, 2024 11:48 AM

To: Nicholas Green <Nicholas.Green@doj.ca.gov>; Mark Beckington <Mark.Beckington@doj.ca.gov>; Natasha Saggar Sheth <Natasha.Sheth@doj.ca.gov>; Paul Stein <Paul.Stein@doj.ca.gov>; Thomas Patterson <Thomas.Patterson@doj.ca.gov>; akilahfaizah2@gmail.com; saweber31@cox.net

Subject: Working toward our shared goal of democracy and election integrity in the United States of America, and especially in California, as we strive for the election of fellow Californian!

EXTERNAL EMAIL: This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

[Quoted text hidden]

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Carl Gordon <universityofthehood@gmail.com>

Rep. Debbie Dingell On Clinton Loss: 'People Took Michigan For Granted'

Carl Gordon <universityofthehood@gmail.com>

Sat, Nov 19, 2016 at 5:36 AM

To: Bonnie.Zorn@mail.house.gov, Marc Elias <meli@perkinscoie.com>

The Honorable Debbie Dingell

Marc Elias
Firmwide Chair, Political Law Practice;
Member, Firmwide Executive Committee
30 Rockefeller Plaza 22nd Floor
New York, New York 10112-0085
meli@perkinscoie.com

We all must start now and work to elect a woman president in 2020! Kamala Harris the new senator-elect from California.

Two words to make it happen: *Orange Slices*

<http://lat.ms/2fFehya>

The YouTube video: <http://bit.ly/2fGpELI>

The voters at the University of the 'Hood® from all over the country appreciate and honor those who gave their lives to the struggle, and for those that lived. We at the University of the 'Hood® honor them by voting! You should too!

Young, Gifted and Black North Carolinians you can do no less! Go Vote ... Today! Pay it forward for your unborn children, and to honor your ancestors for securing your right to Vote!

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Please see attached.

Thank you for your cooperation, and I look forward to your response. Please help

Sincerely,

Carl Gordon, MPA, University of Southern California

Co-founder and First Steward of University of the 'Hood®

 [9 23 16 I graduated With a Little Help from My...](#)

4 attachments



10 9 16 ME AT BBA 2014.jpg
517K



9 22 16 ASIAN PART OF THE OBAMA COALITION.jpg
333K



9 22 16 Hillary Clinton's campaign PAPER.jpg
316K

9 23 16 CONGRATULATION TO HILLARY_Layout 1.pdf
4358K

EXHIBIT B



Carl Gordon <universityofthehood@gmail.com>

Working toward our shared goal of democracy and election integrity in the United States of America, and especially in California, as we strive for the election of fellow Californian!

Nicholas Green <Nicholas.Green@doj.ca.gov>
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Nick

Nicholas R. Green

Deputy Attorney General

California Attorney General's Office | Government Law Section

455 Golden Gate Avenue, Suite 11000 | San Francisco, CA 94102 |

Tel: (415) 510-3597 | Nicholas.Green@doj.ca.gov

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